



U.S. Department of Justice

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VIA ECF

Hon. John G. Koeltl
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

The 11/4/20 conference is
canceled. The parties should submit
the proposed stipulation by 11/30/20.
So ordered.

Re: *Shen v. Wolf, et al.*, No. 20 Civ. 6853 (JGK)

Dear Judge Koeltl:

Dr. G. Koeltl
11/4/20 U.S.D.J.

This Office represents the government in this action in which plaintiff principally seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate her Application to Register Permanent Residence or Adjust Status (Form I-485) and her Refugee/Asylee Relative Petition (Form I-730). On behalf of both sides, I write respectfully to request that the Court adjourn *sine die* the pre-trial conference presently scheduled for November 4, 2020, and hold this case in abeyance in contemplation of dismissal.

The parties make these requests because USCIS has now scheduled an interview for November 24, 2020. Given this development, the parties have agreed to a dismissal of this action without prejudice and are preparing an appropriate stipulation and proposed order for submission to the Court for its consideration and approval in the next two weeks. I apologize for making these requests less than 48 hours before the November 4, 2020 conference; however, the interview was scheduled earlier today and the parties have conferred and made their requests as promptly as possible.

Plaintiff's counsel joins in these requests.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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Acting United States Attorney

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cc: Counsel of record (via ECF)